

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MITRE SPORTS INTERNATIONAL LIMITED, :
Plaintiff, : No. 08-CIV-9117 (GBD)(HBP)
v. :
HOME BOX OFFICE, INC., :
Defendant. :
-----x

PROPOSED VOIR DIRE

Questions Both Parties Request The Court Pose To The Jury

1. Have you, or has anyone close to you, ever worked in journalism, television or film production, or media broadcasting? If so, please explain.
2. Have you, or has anyone close to you, ever been a plaintiff or a defendant in a lawsuit? How about a lawsuit for libel or defamation? If so, please explain.
3. Have you, or has anyone close to you, had dealings with Home Box Office, Inc. or Mitre Sports International Limited? If so, please explain.
4. Have you, or has someone close to you, ever been included in a media report? If so, did you feel that you were treated, or that the person was treated, fairly or unfairly by the media?
5. Do you know any of the following individuals? [To be submitted by April 6, 2015 per Court's Order - List of witnesses and attorneys]

Questions HBO Requests The Court Pose To The Jury

1. Have you heard, read, or seen anything about this case?
2. There are two television journalists who appear in the report at issue in this case, Bryant Gumbel and Bernard Goldberg. Do you know either of them? Do you, for any reason, have an opinion of either that would affect your ability to be fair in the case?

3. Do you regularly watch *Real Sports with Bryant Gumbel*?
4. Have you ever been a juror or a grand juror before?
5. Have you ever testified in a lawsuit before?
6. Where do you get most of your news?
 - a. Newspaper?
 - b. Internet?
 - c. Television?
 - d. Radio?
7. Have you ever had any training in, or worked in, the legal profession?
8. Would you say, for whatever reason, that you have an opinion about any of the following that would affect your ability to be fair this case:
 - a. HBO?
 - b. Television journalists?
 - c. Mitre?
9. Do you feel that the plaintiff, Mitre, must have a strong case merely because it filed a lawsuit?
10. Is there anything I have not mentioned that makes you doubt your ability to act as a fair, objective, and impartial juror in this case?

Questions Mitre Requests The Court Pose To The Jury

1. What are your top three sources for news? Please be specific and identify the three starting with your top source for news.
2. Throughout your employment history, what jobs or occupations have you held and for how long?
3. Do you think that TV news programs truthfully and accurately report the news?
4. Do you have any views about companies whose products are manufactured in developing countries? If yes, please explain.

5. Have you volunteered for, or made a financial contribution to, any organizations? If so, please explain.
6. Have you ever boycotted or changed purchasing decisions about a company's products because you disagreed with the company's business practices? If so, please explain.
7. Are you a fan of professional soccer?
8. Have you ever been in any country outside the United States? If so, which countries, and identify whether you went for work or vacation?



Lloyd Constantine
Robert Begleiter
Ankur Kapoor
Jean Kim
David Scupp
Matthew Vaccaro

CONSTANTINE CANNON LLP
335 Madison Avenue, 9th Floor
New York, NY 10017
Tel: (212) 350-2700

Jason Enzler
1001 Pennsylvania Ave, N.W.
Washington, D.C. 20004
Tel: (202) 203-3500

Counsel for Plaintiff

Respectfully submitted,



Kevin T. Baine
Dane H. Butswinkas
Thomas G. Hentoff
Allison B. Jones
Nicholas G. Gamse
Masha G. Hansford

WILLIAMS & CONNOLLY LLP
725 12th Street, NW
Washington, DC 20005
Tel: (202) 434-5000

Of Counsel:
Stephanie Abrutyn, Home Box Office, Inc.

Counsel for Defendant